REMARKS

Claims 1-13 and 46-66 (all of the pending claims) stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Linden (U.S. Pub. 2002/012882) in view of Marshall (U.S. Pub. 2006/0004607). Claims 1 and 55 are independent. For the reasons explained below, Applicants respectfully submit that the Final Office Action does not establish a prima facie showing of obviousness, and Applicants request that the Examiner withdraw the rejection.

Claim 1

Claim 1 reads as follows:

1. A web site system, comprising:

a web server system that is responsive to requests from online users by generating and returning web pages, wherein the web server system includes one or more applications that generate personalized content for recognized users based on browse histories of such users; and

an event history server that persistently stores event data descriptive of events that occur during browsing sessions of each of a plurality of users of the web server system, wherein the event history server stores the event data substantially as corresponding events are reported to the event history server by the web server system, and makes such event data available in real time to the one or more applications to facilitate personalization of web pages for the users;

wherein the event history server implements a query interface through which the one or more applications retrieve the event data associated with particular users at least by event type and event time of occurrence, and the event history server is capable of responding to a query submitted by an application via said query interface by identifying particular events that match event criteria included in said query, and by returning the event data for said particular events;

and wherein the web server system uses the event data retrieved by the one or more applications via said query interface to generate personalized web pages for transmission to users.

The rejection of claim 1 is improper because, among other reasons, Linden and Marshall do not collectively teach or render obvious an "event history server" that, in the context of the other limitations of the claim, "implements a query interface through which the one or more applications retrieve the event data associated with particular users at least by event type and event time of occurrence."

The Final Office Action points to paragraphs 0105, 0123, 0127, 0138 and 0139 of Linden in connection with this aspect of claim 1. The referenced portions of Linden describe processes in which the purchase histories of customers (paragraph 0105), or the query log records of customers (paragraphs 0123, 0127, 0138 and 0139), are retrieved for off-line analysis. The purpose of this analysis is to detect purchase-based or item-viewing-based relationships or "similarities" between particular items. Each retrieved purchase history is "in the general form of the user ID of a customer together with a list of the product IDs (ISBNs, etc.) of the items (books, CDs, videos, etc.) purchased by that customer." Linden at ¶ 0105. Each retrieved query log record is "in the general form of a browsing session identification together with a list of the identifiers of the items viewed in that browsing session." Linden at ¶ 0127.

Nowhere does Linden suggest that this retrieval of customer purchase histories or query log records involves the use of a "query interface through which the one or more applications retrieve the event data associated with particular users at least by event type and event time of occurrence" as claimed. In this regard, the referenced portions of Linden merely disclose the retrieval of entire purchase histories, and entire query log records, of the customers. Thus, although the retrieved purchase histories and query log records may include event data, nothing in Linden suggests that this event data is retrieved via "a query interface… at least by event type and event time of occurrence" as claimed. Indeed, Linden never suggests that the event data is stored in a format that would enable such a mode of retrieval.

In addition, the purchase histories and query log records in the referenced portions of Linden are not retrieved "by one or more applications" that "generate personalized content for recognized users based on browse histories of such users" as claimed. Rather, they are retrieved by an "off-line table generation process 66" (Fig. 1) for the purpose of generating one or more similar items tables 60. See Linden at, e.g., ¶ ¶0081 and 0102. These similar items tables 60 do not contain or represent "personalized content for recognized users" as claimed.

Thus, contrary to the position taken in the Final Office Action, Linden does not disclose or suggest, in the context of the other limitations of the claim, an "event history server" that "implements a query interface through which the one or more applications retrieve the event data associated with particular users at least by event type and event time of occurrence" as claimed.

The rejection of claim 1 is also improper for the independent reason that Linden and Marshall do not collectively teach or render obvious an event history server that "is capable of responding to a query submitted by an application via said query interface by identifying particular events that match event criteria included in said query, and by returning the event data for said particular events." The Final Office Action acknowledges that this feature is missing from Linden, but asserts that the addition of this feature would have been obvious in view of the disclosure at paragraphs 0068, 0073 and 0074 of Marshall. Marshall, however, does not disclose or suggest an event history server that "is capable of responding to a query submitted by an application via said query interface by identifying particular events that match event criteria included in said query." In this regard, the "query" mentioned in paragraph 0068 of Marshall is a search query submitted by a user, and not a "query submitted by an application" as claimed. In addition, the user-submitted search query in Marshall is apparently a keyword search for information about a health condition, and its execution does not involve "identifying particular events that match event criteria included in said query" as claimed.

The rejection of claim 1 is also improper because the Final Office Action does not identify any particular *reason* that would have prompted one of ordinary skill and creativity to modify the cited art to arrive at the claimed invention. See *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1731 (stating that "it can be important to identify a reason that would have prompted a person of ordinary skill in the art to combine the elements as the new invention does.") In connection with this issue, the Final Office Action merely states that the addition of Marshall's query submission feature to Linden would have been obvious "in order that patient information can be retrieved." Linden, however, does not relate to the storage of patient information. In addition, nothing in the record suggests that Linden's system would benefit in any way from the ability to retrieve patient information. Thus, the Final Office Action does not identify a reason for combining Linden and Marshall.

For at least these reasons, the Final Office Action does not establish a prima facie case of obviousness with respect to claim 1, and the rejection is improper.

Independent Claim 55

Claim 55 recites substantially the same features as those discussed above in connection with claim 1, but in method format. Specifically, claim 55 includes the following recitation:

with the one or more applications, retrieving, from the event history server, the event data associated with particular users, wherein the one or more applications retrieve the event data at least by event type and event time of occurrence via a query interface of the event history server, wherein the event history server responds to a query submitted by an application via said query interface by identifying particular events that match event criteria included in said query, and by returning the event data for said particular events.

Thus, the rejection of claim 55 is improper for substantially the same reasons as discussed above for claim 1.

Dependent Claims

Each dependent claim is patentable over Linden and Marshall in view of its respective dependency from claim 1 or claim 55. In addition, the dependent claims recite additional features that provide additional patentable distinctions over Linden and Marshall.

For example, claim 2 states that "the event history server records the event data for a given event as an event object that includes at least the following: an event type identifier, an event value, and a time stamp, each event object being separately retrievable via said query interface." The Final Office Action points to paragraph 0105 in of Linden connection with this feature. Nothing in paragraph 0105 or any other portion of Linden, however, suggests that the event data for a given event is recorded as a separately retrieval event object as claimed.

As another example, claim 3 states that the event history server "includes at least one storage layer server that stores the event data persistently by user ID, and further includes at least one cache layer server that caches event data of online users." The Final Office Action points to paragraph 0086 of Linden in connection with this feature. The cited paragraph, however, says nothing about how event data is stored.

As another example, claim 4 (which depends from claim 3) states that "the cache layer server is configured to collect event data of an unrecognized user during a browsing session, and to pass such collected event data to the at least one storage layer server for persistent storage thereof if the unrecognized user becomes recognized during the browsing session." The Final Office Action points to paragraph 0029 of Linden in connection with this feature. The cited paragraph, however, simply does not disclose or suggest the recited feature.

As another example, claim 5 states that the event history server "comprises a plurality of cache layer servers, each of which is assigned to a different respective set of browse session IDs

such that a given user remains assigned to a particular cache layer server throughout a browse session." The referenced portion of Linden, namely paragraph 0056, contains no suggestion of this feature.

As yet another example, claims 7 and 8 state that the query interface supports queries of the form "has User X accessed URL Y?" and "when has User X accessed URL Y?", respectively. The Final Office Action points to paragraph 0138 of Linden in connection with these two claims. Nothing in paragraph 0138, however, suggests a query interface that supports either of these two types of queries.

Indeed, the features recited in the foregoing dependent claims are nowhere to be found in either Linden or Marshall. Additional patentable distinctions are recited in other dependent claims.

Conclusion

In view of the foregoing, Applicants request that the Examiner withdraw the obviousness rejection and allow the present application.

By focusing on specific claims and claim limitations above, Applicants do not imply an agreement with, and do not acquiesce in, the statements made in the Final Office Action regarding other claims and claim limitations.

If any issues remain which can potentially be resolved by telephone, the Examiner is invited to call the undersigned attorney of record at his direct dial number listed below.

Respectfully submitted,

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